

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 3:20-cr-00165
v.	)	JUDGE CAMPBELL
	)	
CALEB D. JORDAN	)	

**UNOPPOSED MOTION FOR TEMPORARY APPOINTMENT OF CO-COUNSEL**

Undersigned counsel respectfully requests that the Court appoint additional counsel from the Criminal Justice Act panel to represent defendant Caleb Jordan. As explained further below, the purpose of such an appointment is to allow a CJA panel attorney to represent Mr. Jordan concurrently with undersigned counsel for a short period before counsel leaves the Office of the Federal Public Defender (i.e., *not* to have Mr. Jordan represented by two attorneys permanently).

Undersigned counsel is moving out of state for personal reasons. The Office of the Federal Public Defender has arranged to distribute many of counsel's cases to other lawyers within the office. However, the office cannot presently absorb all of counsel's cases due to (1) current case numbers, (2) staffing restrictions that prohibit the office from immediately replacing undersigned counsel, and (3) conditions created by the current pandemic. Accordingly, the office needs to assign some cases to the Criminal Justice Act panel. Mr. Jordan's case is one such case.

Ordinarily under these circumstances, undersigned counsel would simply move to withdraw. However, this is an unusually complicated case, with at least one expert currently retained and at least one more anticipated. To facilitate the transfer of current expert contracts, share funds, and provide time to transfer both discovery and historical knowledge of the case, undersigned counsel requests that the Court permit a brief period of concurrent representation. Federal Public Defender Henry Martin has specifically approved of this plan, and the

government does not oppose it. Staff from this office have already begun the process of identifying an attorney who is currently able to handle a case of this complexity. Undersigned counsel will likewise endeavor to ensure that the transition to new counsel will be seamless.

For all the above reasons, undersigned counsel respectfully moves requests that the Court appoint co-counsel in this case from the CJA panel for the limited purpose of permitting that attorney to seamlessly transition into representing Mr. Jordan.

Respectfully submitted,

s/ Andrew C. Brandon  
ANDREW C. BRANDON  
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Nashville, Tennessee 37203  
615-736-5047

Attorney for Caleb D. Jordan

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2020, I electronically filed the foregoing Unopposed Motion for Temporary Appointment of Co-Counsel with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to S. Carran Daughtrey, Assistant United States Attorney, U.S. Attorney's Office, 110 Ninth Avenue, South, Suite A961, Nashville, Tennessee 37203-3870 and Kyle P. Reynolds, Trial Attorney, U.S. Department of Justice, Criminal Division, 1301 New York Avenue, NW, Washington, DC 20005.

s/ Andrew C. Brandon  
ANDREW C. BRANDON